

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
vs.	)	<b>Criminal Case No. 2:06-mj-069-DRB</b>
	)	
<b>ROSA E. RINCON</b>	)	

**MOTION FOR FUNDS TO EMPLOY INTERPRETER**

COMES NOW Defendant, by and through counsel, and prays that this Court will authorize him to employ Ms. Beverly M. Childress, 24178 Antioch Rd., Andalusia, AL 36420, as a translator in this case at the expense of the government. As grounds Defendant would show as follows:

1. Ms. Rincon does not speak English.
2. Ms. Rincon's attorney's facility with Spanish is inadequate to assure accurate communications and, thus, competent representation.
3. The absence of a federally certified interpreter would prejudice the right of Defendant to a fair trial.
4. Ms. Rincon is incarcerated, is indigent, and is without funds with which to employ an interpreter.
5. Ms. Childress is a federally certified interpreter who is well known to this Court. Ms. Childress has agreed to accept appointment.

WHEREFORE, the premises considered, Defendant prays that the Court will appoint, and/or permit counsel to employ at the expense of the government, Ms. Beverly Childress as interpreter for Defendant.

RESPECTFULLY SUBMITTED, this \_\_24<sup>th</sup>\_\_ day of July, 2006.

/s/ JAY LEWIS  
Law Offices of Jay Lewis, L.L.C.  
P.O. Box 5059  
Montgomery, Alabama 36103  
(334) 263-7733 (Voice)  
(334) 832-4390 (Fax)  
[J-Lewis@JayLewisLaw.com](mailto:J-Lewis@JayLewisLaw.com)  
ASB-2014-E66J  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on the \_24\_ day of July, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

Terry Moorer  
Office of the United States Attorney  
One Court Square, Suite 201  
Montgomery, AL 36104

/s/ JAY LEWIS  
Law Offices of Jay Lewis, L.L.C.  
P.O. Box 5059  
Montgomery, Alabama 36103  
(334) 263-7733 (Voice)  
(334) 832-4390 (Fax)  
[J-Lewis@JayLewisLaw.com](mailto:J-Lewis@JayLewisLaw.com)  
ASB-2014-E66J  
Attorney for Defendant